

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF GEORGIA COLUMBUS DIVISION**

Azad Kabir, M.D., Plaintiff, v. WebMD LLC and Internet Brands, Defendants.

Civil Action No.: 4:25-CV-130 (COL)

MOTION FOR PRO SE REPRESENTATION

COMES NOW, Plaintiff Azad Kabir, M.D., and respectfully moves this Honorable Court to grant an extension of time and to allow Plaintiff to proceed pro se in this matter, and in support thereof states as follows:

1. Plaintiff Azad Kabir, M.D., is the sole owner and assignee of the patent in question, which was previously assigned to Doctor Ai LLC solely for the purpose of initiating this litigation. The patent has since been reverted to Plaintiff personally, as reflected in the attached IP assignment agreement marked as Exhibit A.
2. Plaintiff originally assigned the patent to Doctor Ai LLC to facilitate the filing of this action. However, due to financial constraints and the inability to secure counsel on a contingency basis, Plaintiff has reassigned the patent to himself to proceed as a pro se litigant.
3. Plaintiff is a physician who provides emergency medical services in Alabama under a week-on/week-off schedule, covering a solo hospitalist service, and is the primary provider for these services. Recently, due to unavoidable circumstances, Plaintiff switched employment from Jack Hughston Memorial Hospital in Phenix City, Alabama, to another hospital in Alabama. While the new work location is far, Plaintiff lives approximately 90 minutes from the court, it remains feasible for Plaintiff to appear in court as needed, despite the increased travel time.
4. Defendant WebMD LLC and its parent company, Internet Brands, maintain offices in Georgia and can easily secure local counsel. Their services, including the allegedly infringing products, are actively marketed and accessible in the Middle District of Georgia, establishing jurisdiction.
5. Due to the nature of Plaintiff's emergency medical schedule and the financial hardship experienced, Plaintiff respectfully requests that the Court allow him to proceed pro se as the sole and rightful owner of the patent in question.

6. Plaintiff further requests that the Court consider granting flexibility regarding deadlines and hearing dates given Plaintiff's obligations as an emergency medical provider at a hospitalist service and sole income earner for his family.
7. Plaintiff asserts that granting this request will not prejudice Defendants, as they have substantial legal resources and nationwide legal counsel capable of responding to the claims in this case.

WHEREFORE, Plaintiff respectfully prays that this Honorable Court:

- A. Grant this Motion and allow Plaintiff to proceed pro se as the sole and rightful owner of the patent in question;
- B. Grant flexibility in scheduling court appearances and filings given Plaintiff's role as an emergency medical provider and the sole hospitalist in a small Alabama hospital, where Plaintiff's presence is critical to maintaining essential healthcare services;
- C. Grant such other and further relief as the Court deems just and equitable under the circumstances.

Respectfully submitted this ____ day of May, 2025.



By: /s/ Azad Kabir, M.D., MSPH

Pro Se

1120 Beach Blvd Biloxi, MS 39530

Phone: (228) 342-6278

Email: azad.kabir@ddrx.net